

# EXHIBIT 1

**From:** [Alejandra Salinas](#)  
**To:** [Dozier, Wesley](#)  
**Subject:** [EXT] FW: Authors Guild, et al. v. OpenAI, et al.  
**Date:** Wednesday, December 4, 2024 5:07:19 PM

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**Alejandra C. Salinas | Susman Godfrey LLP**  
o. 713.653.7802 | c. 956.337.0910

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**From:** Alejandra Salinas <ASalinas@susmangodfrey.com>  
**Date:** Monday, December 2, 2024 at 5:59 PM  
**To:** Najemy, Laura <lnajemy@orrick.com>  
**Cc:** Hurst, Annette L. <ahurst@orrick.com>, Briant, Jared B. <jared.briant@faegredrinker.com>, carrie.beyer <carrie.beyer@faegredrinker.com>, Schreiber, Andrew <aschreiber@orrick.com>, Geman, Rachel <rgeman@lchb.com>  
**Subject:** Re: Authors Guild, et al. v. OpenAI, et al.

Thank you.

**Alejandra C. Salinas | Susman Godfrey LLP**  
o. 713.653.7802 | c. 956.337.0910

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**From:** Najemy, Laura <lnajemy@orrick.com>  
**Date:** Monday, December 2, 2024 at 6:52 PM  
**To:** Alejandra Salinas <ASalinas@susmangodfrey.com>  
**Cc:** Hurst, Annette L. <ahurst@orrick.com>, Briant, Jared B. <jared.briant@faegredrinker.com>, carrie.beyer <carrie.beyer@faegredrinker.com>, Schreiber, Andrew <aschreiber@orrick.com>, Geman, Rachel <rgeman@lchb.com>  
**Subject:** RE: Authors Guild, et al. v. OpenAI, et al.

**EXTERNAL Email**  
Alejandra,

Thank you. We can confirm that this agreement resolves this issue in Microsoft's motion.

Best,  
Laura

**Laura B. Najemy :: Orrick :: 617 880 1889**

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**From:** Alejandra Salinas <ASalinas@susmangodfrey.com>  
**Sent:** Monday, December 2, 2024 4:42 PM  
**To:** Najemy, Laura <lnajemy@orrick.com>  
**Cc:** Hurst, Annette L. <ahurst@orrick.com>; Briant, Jared B. <jared.briant@faegredrinker.com>; carrie.beyer <carrie.beyer@faegredrinker.com>; Schreiber, Andrew <aschreiber@orrick.com>; Geman, Rachel <rgeman@lchb.com>  
**Subject:** Re: Authors Guild, et al. v. OpenAI, et al.

**[EXTERNAL]**

Laura,

Thanks for your email. With the understanding that this will resolve Microsoft's motion on this issue, Plaintiffs are willing to agree to ask our agents and publishers for the information you listed below (and repeated here) as it relates to the class works.

1. sales reports
2. royalty reports
3. option payments
4. license payments
5. licensing/publishing agreements
6. covenants not to sue
7. settlements
8. any reports, forecasts, or studies regarding the valuation of and/or market

Please confirm we have an agreement. Feel free to give me a call on my cell at 956-337-0910 if you have any questions.

Thanks,  
Alejandra

**Alejandra C. Salinas | Susman Godfrey LLP**  
o. 713.653.7802 | c. 956.337.0910

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**From:** Najemy, Laura <[lnajemy@orrick.com](mailto:lnajemy@orrick.com)>  
**Date:** Monday, December 2, 2024 at 11:20 AM  
**To:** Alejandra Salinas <[ASalinas@susmangodfrey.com](mailto:ASalinas@susmangodfrey.com)>  
**Cc:** Hurst, Annette L. <[ahurst@orrick.com](mailto:ahurst@orrick.com)>, Briant, Jared B. <[jared.briant@faegredrinker.com](mailto:jared.briant@faegredrinker.com)>, carrie.beyer <[carrie.beyer@faegredrinker.com](mailto:carrie.beyer@faegredrinker.com)>, Schreiber, Andrew <[aschreiber@orrick.com](mailto:aschreiber@orrick.com)>  
**Subject:** RE: Authors Guild, et al. v. OpenAI, et al.

**EXTERNAL Email**

Alejandra,

Yes, if Plaintiffs agree to seek these documents from their literary agents and publishers and provide them to us, we can consider this issue in our motion resolved.

Thank you,  
Laura

**Laura B. Najemy :: Orrick :: 617 880 1889**

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**From:** Alejandra Salinas <[ASalinas@susmangodfrey.com](mailto:ASalinas@susmangodfrey.com)>  
**Sent:** Monday, December 2, 2024 11:06 AM

**To:** Najemy, Laura <[lnajemy@orrick.com](mailto:lnajemy@orrick.com)>

**Cc:** Hurst, Annette L. <[ahurst@orrick.com](mailto:ahurst@orrick.com)>; Briant, Jared B. <[jared.briant@faegredrinker.com](mailto:jared.briant@faegredrinker.com)>;  
carrie.beyer <[carrie.beyer@faegredrinker.com](mailto:carrie.beyer@faegredrinker.com)>; Schreiber, Andrew <[aschreiber@orrick.com](mailto:aschreiber@orrick.com)>

**Subject:** Re: Authors Guild, et al. v. OpenAI, et al.

**[EXTERNAL]**

Laura,

Thanks for your email. I will discuss with my team and get back to you. Just to confirm, is it Microsoft's position that if we provide these categories of documents, Microsoft's motion on this issue will be resolved?

**Alejandra C. Salinas | Susman Godfrey LLP**  
o. 713.653.7802 | c. 956.337.0910

On Dec 2, 2024, at 8:31 AM, Najemy, Laura <[lnajemy@orrick.com](mailto:lnajemy@orrick.com)> wrote:

**EXTERNAL Email**

Hi Alejandra,

Just circling back on this. Let me know if you would like to hop on a call today to discuss.

Thanks,  
Laura

**Laura B. Najemy :: Orrick :: 617 880 1889**

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**From:** Najemy, Laura

**Sent:** Wednesday, November 27, 2024 2:37 PM

**To:** [asalinas@susmangodfrey.com](mailto:asalinas@susmangodfrey.com)

**Cc:** Hurst, Annette L. <[ahurst@orrick.com](mailto:ahurst@orrick.com)>; Briant, Jared B. <[jared.briant@faegredrinker.com](mailto:jared.briant@faegredrinker.com)>; carrie.beyer <[carrie.beyer@faegredrinker.com](mailto:carrie.beyer@faegredrinker.com)>;  
Schreiber, Andrew <[aschreiber@orrick.com](mailto:aschreiber@orrick.com)>

**Subject:** Authors Guild, et al. v. OpenAI, et al.

Alejandra,

Following up on your phone call last week, below please find a list of specific documents (or types of documents) that we would like the individual plaintiffs to request from their agents and publishers:

1. sales reports
2. royalty reports
3. option payments
4. license payments
5. licensing/publishing agreements
6. covenants not to sue
7. settlements
8. any reports, forecasts, or studies regarding the valuation of and/or market

for any of the Author Plaintiffs' Copyrighted Works

Please let us know if they are each willing to make these requests and whether can narrow the dispute at all that is before the Court.

Thank you,  
Laura

**Laura B. Najemy**  
Partner

Orrick <image001.jpg>

Boston  
T +1-617-880-1889  
M +1-413-478-6502  
[lnajemy@orrick.com](mailto:lnajemy@orrick.com)

<image003.png>

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